UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4WD-RPB

OCT 10 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

Subject: Approval of QAPP
Grenada Manufacturing, LLC
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

EPA's Office of Quality Assurance and Data Integration and the South Programs Section at Region 4 have reviewed the Quality Assurance Project Plan (QAPP) for 'Interim Measures Additional Sampling and Equalization Lagoon Closure' at the Grenada Manufacturing Plant in Grenada, Mississippi. Our offices have found the document to be acceptable, provided the comments contained in EPA's enclosed memo, dated September 29, 2000, are addressed.

Since the comments contained in the September 29 memo should be relatively straightforward to address; you may proceed concurrently with addressing the comments and beginning preparations for the field sampling. EPA will require that all conditions of the updated QAPP be met prior to sampling and analysis, but will allow your discression when to proceed with sampling.

If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager.

Sincerely,

Narindar M. Kumar,
Chief, RCRA Programs Branch
Waste Management Division enclosures

cc: Louis Crawford, MDEQ
John Devic, Textron Automotive
John Bozick, Meritor Automotive

Docket Number 450419

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
SCIENCE AND ECOSYSTEM SUPPORT DIVISION
OFFICE OF QUALITY ASSURANCE
REGION IV
980 COLLEGE STATION ROAD
ATHENS, GA 30605

SEP 29 2000

4SES-OQA

MEMORANDUM

SUBJECT: Draft Quality Assurance Project Plan
Interim Measures Additional Sampling and Equalization Lagoon Closure Monitoring, Grenada Manufacturing
Grenada, Mississippi

FROM: John P. McConney
Environmental Scientist
Office of Quality Assurance and Data Integration

THRU: Gary Bennett, Chief
Office of Quality Assurance and Data Integration

TO: Don Webster, Facility Manager
South Programs Section, RCRA Programs Branch
Waste Management Division

We have reviewed the subject document and recommend that the subject QAPP be approved provided that the following comments be addressed. In addition, the items listed as "No" or items with comments in the attached QAPP checklist should be addressed for the QAPP to be approved.

1. Section 4.0 - This section detailing the project organization does not identify a Quality Assurance Officer. Moreover, quality assurance responsibilities are apparently not assigned to either an individual or organization involved in this project. This critical omission should be corrected.

2. Tables 6.2, 12-1 - In order to be complete, these tables on the analytical methodology should include the extraction and clean-up methods. In addition, the source of the methods should be referenced.

3. Section 7.0 - This section on data quality objectives (DQO) does not present any evidence or documentation that the DQO process was followed. The DQO process should be followed and documentation presented in the document to demonstrate that the process was followed. It is recommended that the EPA document "Guidance for the DQO Process", EPA QA/G-4, be followed.

4. Section 15.1.1 - This section references analytical data validation guidelines from Region 1. However, the subject site is located in Region 4 and the use of these guidelines is not appropriate. Data validation guidance documents appropriate to Region 4 should be referenced. Such references would include "Data Validation SOP for CLP Routine Analytical Services" and the inorganic and organic National Functional Guidelines.

Title: QAPP, Grenada Manufacturing
Location: Grenada Manufacturing
QAPP Date: August 2000
Review Date: September 2000

AC.2 QAPP REVIEW CHECKLIST

ELEMENT	COMMENTS
A1. Title and Approval Sheet	
Title	yes
Organization's name	yes
Dated signature of project manager	yes
Dated signature of quality assurance officer	no
Other signatures, as needed	yes
A2. Table of Contents	yes
A3. Distribution List	yes
A4. Project/Task Organization	
Identifies key individuals, with their responsibilities (data users, decision-makers, project QA manager, subcontractors, etc.)	needs clarification, see comment #1
Organization chart shows lines of authority and reporting responsibilities	needs clarification, see comment #1
A5. Problem Definition/Background	
Clearly states problem or decision to be resolved	yes
Provides historical and background information	yes
A6. Project/Task Description	
Lists measurements to be made	yes
Cites applicable technical, regulatory, or program-specific quality standards, criteria, or objectives	needs clarification, see comment #3
Notes special personnel or equipment requirements	n/a
Provides work schedule	yes
Notes required project and QA records/reports	yes
A7. Quality Objectives and Criteria for Measurement Data	
States project objectives and limits, both qualitatively and quantitatively	needs clarification, see comment #3
States and characterizes measurement quality objectives as to applicable action levels or criteria	needs clarification, see comment #3
A8. Special Training Requirements/Certification Listed	
States how provided, documented, and assured	no
A9. Documentation and Records	
Lists information and records to be included in data report (e.g., raw data, field logs, results of QC checks, problems encountered)	yes
States requested lab turnaround time	no
Gives retention time and location for records and reports	yes

AC.2 QAPP REVIEW CHECKLIST (CONTINUED)

ELEMENT		COMMENTS
B1. Sampling Process Design (Experimental Design) States the following:		
Type and number of samples required		yes
Sampling design and rationale		yes
Sampling locations and frequency		yes
Sample matrices		yes
Classification of each measurement parameter as either critical or needed for information only		yes
Appropriate validation study information, for nonstandard situations		n/a
B2. Sampling Methods Requirements		
Identifies sample collection procedures and methods		yes
Lists equipment needs		yes
Identifies support facilities		n/a
Identifies individuals responsible for corrective action		elsewhere in document
Describes process for preparation and decontamination of sampling equipment		yes
Describes selection and preparation of sample containers and sample volumes		yes
Describes preservation methods and maximum holding times		yes
B3.	Sample Handling and Custody Requirements	
Notes sample handling requirements		yes
Notes chain-of-custody procedures, if required		yes
B4.	Analytical Methods Requirements	
Identifies analytical methods to be followed (with all options) and required equipment		needs clarification, see comment #2
Provides validation information for nonstandard methods		n/a
Identifies individuals responsible for corrective action		elsewhere in document
Specifies needed laboratory turnaround time		no
B5.	Quality Control Requirements	
Identifies QC procedures and frequency for each sampling, analysis, or measurement technique, as well as associated acceptance criteria and corrective action		yes
References procedures used to calculate QC statistics including precision and bias/accuracy		no
B6.	Instrument/Equipment Testing, Inspection, and Maintenance Requirements	
Identifies acceptance testing of sampling and measurement systems		yes
Describes equipment preventive and corrective maintenance		yes
Notes availability and location of spare parts		n/a
B7.	Instrument Calibration and Frequency	

AC.2 QAPP REVIEW CHECKLIST (CONTINUED)

ELEMENT		COMMENTS
	Identifies equipment needing calibration and frequency for such calibration	yes
	Notes required calibration standards and/or equipment	yes
	Cites calibration records and manner traceable to equipment	yes
B8.	Inspection/Acceptance Requirements for Supplies and Consumables	
	States acceptance criteria for supplies and consumables	yes
	Notes responsible individuals	yes
B9.	Data Acquisition Requirements for Nondirect Measurements	
	Identifies type of data needed from nonmeasurement sources (e.g., computer databases and literature files), along with acceptance criteria for their use	n/a
	Describes any limitations of such data	n/a
	Documents rationale for original collection of data and its relevance to this project	n/a
B10. Data Management		
	Describes standard record-keeping and data storage and retrieval requirements	yes
	Checklists or standard forms attached to QAPP	n/a
	Describes data handling equipment and procedures used to process, compile, and analyze data (e.g., required computer hardware and software)	n/a
	Describes process for assuring that applicable Office of Information Resource Management requirements are satisfied	n/a
C1.	Assessments and Response Actions	
	Lists required number, frequency and type of assessments, with approximate dates and names of responsible personnel (assessments include but are not limited to peer reviews, management systems reviews, technical systems audits, performance evaluations, and audits of data quality)	yes
	Identifies individuals responsible for corrective actions	yes
C2.	Reports to Management Identifies frequency and distribution of reports for:	
	Project status	no
	Results of performance evaluations and audits	yes
	Results of periodic data quality assessments	yes
	Any significant QA problems	yes
	Preparers and recipients of reports	yes
D1. Data Review, Validation, and Verification		
	States criteria for accepting, rejecting, or qualifying data	needs clarification, see comment #4
	Includes project-specific calculations or algorithms	n/a

AC.2 QAPP REVIEW CHECKLIST (CONTINUED)

ELEMENT	COMMENTS
D2. Validation and Verification Methods	
Describes process for data validation and verification	yes
Identifies issue resolution procedure and responsible individuals	yes
Identifies method for conveying these results to data users	yes
D3. Reconciliation with User Requirements	
Describes process for reconciling project results with DQOs and reporting limitations on use of data	yes

References

EPA/600/R-98/018, Guidance for Quality Assurance Project Plans, EPA QA/G-5, February 1998
(Available from EPA's Website: http://www.epa.gov/ncerqa/qa/qa_docs.html#R-5)

RCRA/FEDERAL FACILITIES RECORD CENTER DOCUMENT TRANSMITTAL FORM

Please DO NOT submit Un-dated material. DO NOT submit Government Financial/Funding Information, includ Contract Costs. Please DO NOT submit Duplicate Copies. Please DO submit records to the RCRA Records Cen located at the North end of the 10th floor.

Your Name: Donald Webster Transmittal Date: 7/30/2009

Facility/Site Name: Grenada Manufacturing EPA ID# MSD007037278

Document Date: 10/10/2000

Document Title: Approval of QAPP

Special Instuctions:

Confidential: Yes _____ No ✓

Please check the type of document below:

RCRA

____ EPA generated Correspondence

____ State Program Authorization/Approval Files

✓ Administrative Record (EPA issued permits)

____ Grants and Other Program Support Agreements

____ Inspection Reports (EPA)

____ Enforcement Action (EPA)

Federal Facilities Superfund (NPL/CERCLA Sites): (Documents to be maintained in the EPA Record C must have the EPA ID # and Operable Unit)

____ EPA generated Correspondence

____ Federal Facility Agreements / Site Management Plan / Corrective Action Management Plan

____ Remedial Investigation/Feasibility Study (RI/FS) Work Plan

____ Remedial Investigation/Feasibility Study (RI/FS) Report

____ Proposed Plan

____ Record of Decision (ROD)

____ Record of Decision Amendment

____ Explanation of Significant Differences (ESD)

____ Remedial Action Report

____ Remedial Design Report

____ Five Year Review

____ Completion Report

____ Closeout Report

____ EPA Generated Correspondence

____ Administrative Record Index

____ Transfer and Lease Documents

____ Land Use Control Report

____ Operating Properly and Successfully Certification

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DON WILLIAMS PLANT ENVIRONMENTAL
GRENADA MANUFACTURING LLC
635 HIGHWAY 332
GRENADA MS 38901

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OCT 10 2000

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